

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 CASE NO.:

JAMISIA SEYMONE TERRELL

18-13553-JDW

TRUSTEE'S OBJECTION TO MOTION TO REINSTATE CHAPTER 13 CASE

COMES NOW the Chapter 13 Trustee, Locke D. Barkley (the "Trustee"), by and through counsel, and files this Objection to the Debtor's *Motion to Reinstate Case* (Dkt. #18) (the "Motion"), and in support thereof states as follows:

1. On September 17, 2018, the Debtor initiated this proceeding with the filing of a Chapter 13 Bankruptcy Petition (Dkt. #1). This case was subsequently dismissed on or November 20, 2018, due to the failure of the Debtor to pay required fees to this Court.

2. Through the month of December 2018, plan payments are delinquent in the amount of \$1,075.50 and continue to accrue at the rate of \$239.00 bi-weekly (or \$518.00 per month) thereafter.

3. The Motion should be denied unless the Debtor is able to bring all plan payments current through the date of hearing, comply with all prior orders of this Court and cure all deficiencies which may have caused such dismissal on or before the date of the hearing on the motion.

WHEREFORE, PREMISES CONSIDERED, the Trustee, prays that upon notice and hearing that this Court enter its order denying the Motion. The Trustee further requests such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: December 19, 2018

Respectfully submitted,

LOCKE D. BARKLEY, TRUSTEE

/s/ Melanie T. Vardaman
ATTORNEYS FOR TRUSTEE
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C E R T I F I C A T E

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: December 19, 2018

/s/ Melanie T. Vardaman
MELANIE T. VARDAMAN